

Exhibit F

COPY

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

Rene S. Ryman, individually, and as
Personal representative and next-of-kin of
Lowell Edward Ryman, Deceased,

Plaintiff

v.

Case No. CV 08-372 WDS/RLP

Regents of the University of
California f/d/b/a Los Alamos
National Laboratory, The Zia
Company, and The Zia Company,

Defendants.

**DEFENDANT REGENTS OF THE UNIVERSITY OF CALIFORNIA'S FIRST
REQUESTS TO PLAINTIFF FOR PRODUCTION OF DOCUMENTS**

Pursuant to Federal Rule of Civil Procedure 34, Defendant Regents of the University of California d/b/a Los Alamos National Laboratory ("Defendant Regents") hereby requests that Plaintiff produce and permit Defendant Regents to inspect, copy, test, or sample the following documents, electronically stored information, and tangible things in Plaintiff's possession, custody, or control.

REQUEST NO. 1:

Please produce all documents, electronically stored information, and tangible things that demonstrate, account for, describe, reveal the nature of, illustrate, contradict, or in any way relate to activities of Lowell Edward Ryman during his residence in and around the town of Los Alamos, New Mexico, including Lowell Edward Ryman's alleged "[extensive play] in the canyons surrounding the residential areas on Walnut Street, including: Walnut Canyon, Pueblo Canyon, and Acid Canyon" as alleged in paragraph 10 of the Complaint.

RESPONSE:

REQUEST NO. 2:

Please produce all documents, electronically stored information, and tangible things that demonstrate, account for, describe, reveal the nature of, illustrate, contradict, or in any way relate to Plaintiff's claim in paragraphs 9 and 10 of the Complaint that "During his expeditions in [Walnut Canyon, Pueblo Canyon, and Acid Canyon], Lowell Edward Ryman was exposed to radioactive wastes including plutonium."

RESPONSE:

REQUEST NO. 3:

Please produce all documents, electronically stored information, and tangible things, including but not limited to medical records, that demonstrate, account for, describe, reveal the nature of, illustrate, contradict, or in any way relate to Lowell Edward Ryman's medical condition and medical history and to Plaintiff's claim in paragraph 10 of the Complaint that "Lowell Edward Ryman's exposure to radioactive wastes and plutonium as a young boy lead [sic] him to develop multiple myeloma as an adult."

RESPONSE:

REQUEST NO. 4:

Please produce all documents, electronically stored information, and tangible things that demonstrate, account for, describe, reveal the nature of, illustrate, contradict, or in any way relate to the type of ionizing radiation—i.e. alpha particle, beta particle, X-ray, and/or gamma ray—that Plaintiff claims Lowell Edward Ryman was exposed to during his residence in and around the town of Los Alamos, New Mexico.

RESPONSE:

REQUEST NO. 5:

Please produce all documents, electronically stored information, and tangible things that demonstrate, account for, describe, reveal the nature of, illustrate, contradict, or in any way relate to the cumulative dose of ionizing radiation that Plaintiff claims Lowell Edward Ryman received during his residence in and around the town of Los Alamos, New Mexico.

RESPONSE:

REQUEST NO. 6:

Please produce all documents, electronically stored information, and tangible things, including but not limited to medical records, that demonstrate, account for, describe, reveal the nature of, illustrate, contradict, or in any way relate to the medical history of Lowell Edward Ryman's mother, Elma Ryman.

RESPONSE:

REQUEST NO. 7:

Please produce all documents, electronically stored information, and tangible things, including but not limited to medical records, that demonstrate, account for, describe, reveal the nature of, illustrate, contradict, or in any way relate to the medical history of Lowell Edward Ryman's father, Elmer Ryman.

RESPONSE:

REQUEST NO. 8:

To the extent not already produced, please produce all documents, electronically stored information, and tangible things exchanged by and between Rene Ryman, or any legal or other representative of Rene Ryman, and any other person or entity regarding any aspect of Plaintiff's claims in this action, Plaintiff's investigation into the basis for the claims in this action, Plaintiff's investigation of the cause of Lowell Edward Ryman's death, research regarding any association between radiation exposure and any disease, any investigations, studies, or testing being conducted by, on behalf of, or relating in any way to Los Alamos National Laboratory or the town of Los Alamos, New Mexico, or Plaintiff's requests or suggestions that others join as plaintiffs or otherwise support Plaintiff's effort in this case.

RESPONSE:

REQUEST NO. 9:

Please produce all documents, electronically stored information, and tangible things relating in any way to the probate and resolution of the estate of Lowell Edward Ryman, the division of Lowell Edward Ryman's property, and the use of any of Lowell Edward Ryman's property prior to Lowell Edward Ryman's death and during the probate process.

RESPONSE:

REQUEST NO. 10:

To the extent not already produced, please produce all documents, electronically stored information, and tangible things exchanged by and between Rene Ryman, or any legal or other representative of Rene Ryman, with Lowell Edward Ryman, Plaintiff's brother, Lowell Edward Ryman's brothers and sisters, Joyce Ryman, and any Ryman family acquaintances, regarding any

conflicts or differences of opinion between Plaintiff, Plaintiff's brother, Lowell Edward Ryman, Lowell Edward Ryman's brothers and sisters, and Joyce Ryman related to any issues raised or claims asserted in this case.

RESPONSE:

REQUEST NO. 11:

Please produce all documents, electronically stored information, and tangible things exchanged by and between Rene Ryman, or any legal or other representative of Rene Ryman, at any time with any employer of William Ryman, Lowell Edward Ryman's brother.

RESPONSE:

REQUEST NO. 12:

To the extent not already produced, please produce all documents, electronically stored information, and tangible things that Plaintiff has received from the staff at the Zimmerman Library at the University of New Mexico.

RESPONSE:

REQUEST NO. 13:

Please produce a copy of the book or manuscript for the book that Plaintiff authored, entitled "Powerless Plaintiff: Ten Things Every Personal Injury Plaintiff Should Know," which Plaintiff testified is scheduled to be published at the end of 2008 or beginning of 2009.

RESPONSE:

REQUEST NO. 14:

Please produce copies of all bills or invoices including, but not limited to, medical and funeral expense bills, that Plaintiff claims as part of Plaintiff's damages in this case.

RESPONSE:

REQUEST NO. 15:

To the extent not already provided with Plaintiff's December 1, 2008, Causation Expert Disclosures, for each expert witness Plaintiff has retained for this case, please provide copies of the following:

- a. Current resume or CV;
- b. A list of all other cases in which, during the previous four years, the witness testified as an expert at trial or by deposition;
- c. A complete statement of all opinions the witness will express and the basis and reasons for them;
- d. Any reports or written opinions prepared for this case that are intended to be introduced at trial;
- e. Any exhibits that will be used to summarize or support the expert's opinions;
- f. All correspondence to or from the expert and Plaintiff or Plaintiff's counsel.
- g. A statement of the compensation to be paid for the study and testimony in this case.

RESPONSE:

REQUEST NO. 16:

Please complete (including the addition of social security number), execute and have notarized the following authorizations for release of records relating to Plaintiff Rene Ryman:

- a. Employment Records Authorization (non-specific);
- b. Employment Records Authorization (for Digital Teleport, Inc.);
- c. Educational Information and Documents Release.

RESPONSE:

Respectfully submitted,

RODEY DICKASON, SLOAN, AKIN & ROBB, P.A.

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Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on January 2, 2009, I caused to be mailed a copy of the Defendant
Regents of the University of California's First Requests to Plaintiff for Production of Documents
to all counsel of record as listed below:

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Respectfully submitted,

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/s/ Theresa W. Parrish, filed electronically

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